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NACD Responsible Distribution Process

PRIDE SOLVENTS AND CHEMICAL CO. OF NY, INC.

6 Long Island Avenue • Holtsville, New York 11742 • Tel (631) 758-0200 • Fax (631) 758-0290

July 6, 2000

N.Y.S. Department of Environmental Conservation
SUNY Bldg. 40
Stony Brook, NY 11790-2356

Attn: Katy Murphy

Dear Katy:

Please let this serve as notice that Pride Solvents and Chemical Co., Inc. Intends to cease all hazardous waste operations at its West Babylon, New York facility. As required, I have enclosed a copy of our closure plan that includes an updated closure cost estimate.

We have notified our customers of our closure and have assisted them in finding alternate methods of disposal. We are no longer accepting hazardous waste into our facility and have a current hazardous waste inventory of zero gallons.

If you or any representatives of the NYSDEC wish to be present for any of the decontamination processes, or if you have any questions regarding the enclosed plan please feel free to call me.

Sincerely,

PRIDE SOLVENTS & CHEMICAL CO.

Arthur W. Dhom, Jr.
President

AD/jm

Enc.

Cc: Jim Dolan, NYSDEC
Jim Reilly, USEPA

657612

PRIDE SOLVENTS & CHEMICAL CO. OF NY, INC.

Waste Solvent Reclamation Facility
at
West Babylon, NY
(EPA ID# NYD 057722258)
Closure Plan

Prepared for:

Pride Solvents & Chemical Co. of NY, Inc.
6 Long Island Ave.
Holtsville, NY 11742

July 1992

Prepared by:

H2M GROUP
575 Broad Hollow Road
Melville, NY 11747

Updated by:

Eryou Engineering
Nine Lady Jane's Way
Northport, NY 11768

May 2000

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1.0 GENERAL INFORMATION

1.1 Scope

This Closure Plan outlines the procedures to be taken by Pride Solvents & Chemical Co., Inc. during the closure of its waste solvent reclamation facility located at 78 Lamar Street, West Babylon, New York. The intent of the Closure Plan is to eliminate further maintenance and post-closure escape of hazardous waste to the environment.

The Closure Plan has been prepared in conformance with the requirements of 6 NYCRR Subpart 373-2, New York State Department of Environmental Conservation, Final Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, Section 373-2.8, Closure and Post-Closure.

1.2 Process Operations

Pride Solvents reclamation facility at 78 Lamar Street is designed to receive, store and reclaim waste chlorinated and fluorocarbon solvents. All waste solvents are received in 55-gallon drums (no bulk deliveries are accepted) and stored temporarily within a drum storage containment area to await reclamation.

The reclamation process involves filtering, settling, distillation and drying. Several process tanks are used in the operation, namely, a settling tank (650 gallons), the still (475 gallons) and three (3) reclaimed product (distillate) storage tanks (2,000, 500 and 275 gallons). Since the these three tanks do not come in contact with hazardous waste, they are not included in this closure plan. Therefore the total number of gallons of hazardous material in tanks and process equipment is 1,125 gallons. As with the drum storage area, secondary containment is provided for in the solvent reclamation area.

At any given time during the facility's operation, the maximum waste inventory will include 480 drums (26,400 gallons) and 3,900 gallons in the tanks.

2.0 CLOSURE

In general, the closure of Pride Solvents reclamation facility will involve the processing of all waste solvents in storage at the time of closure, the removal and disposition of any sludge and residue, and the cleaning and disposition of process equipment, tanks and drums.

The first step towards closure will be Pride Solvents notifying all clients that they will no longer accept waste solvents for reclamation. This shall be done at the earliest opportunity to allow active generators to arrange for an alternate reclamation site. Once Pride Solvents no longer receives incoming material, all waste solvents stored on-site will be reclaimed.

After reclaiming the waste solvents in storage, all screenings, sludges and residues will be removed from the process equipment and disposed of in the normal manner, via a licensed TSD facility. All process equipment (i.e., tanks, pumps, piping, distillation unit and dryer) will be decontaminated of any waste residues. Any waste products generated as a result of the cleaning will also be disposed of at a licensed TSD facility.

Once clean, the process equipment will be sold as either scrap or used equipment depending on condition. All empty 55-gallon drums will be sold for reconditioning and resale by a drum reconditioner.

2.1 Closure Performance Standard

This Closure Plan is designed to ensure that Pride Solvents' waste storage and reclamation facility will require no further maintenance and controls following closure of its hazardous waste activities. The plan is intended to eliminate threats to human health and the environment. To ensure adequate closure, all wastes, process equipment and structures will be decontaminated and/or disposed of off-site. Following decontamination, oil and water samples will be collected and analyzed for halogenated organics to ensure that no contamination exists. If soil or water contamination is found to exist, appropriate remedial actions will be taken.

2.2 Notification

Pride Solvents shall notify the NYSDEC of its intent to close its hazardous waste storage and reclamation activities 180 days prior to actual closure. Pride Solvents will also notify its clients at this time to allow generators to arrange alternative waste management procedures. In notifying the regulatory agencies of its intent to close its hazardous waste management facility, Pride Solvents will provide the NYSDEC with a copy of this Closure Plan. The Closure Plan should include an updated closure cost estimate.

2.3 Maximum Waste Inventory

Pride Solvents' drum storage facility is designed to hold a maximum of 480 drums (26,400 gallons). For the purpose of this Closure Plan, it is assumed that the settling tank (650 gallons) and still (475 gallons). The maximum hazardous waste inventory is 26,400 gallons in drums and 1,125 gallons in tanks.

2.4 Inventory Reclamation

After Pride Solvents has stopped accepting waste solvent deliveries, the waste inventory will be reclaimed via Pride Solvents' distillation system. As previously mentioned, the maximum waste inventory will be 460 drums (26,400 gallons), plus 1,125 gallons in the reclamation system. Pride Solvents will process the inventoried waste was follows:

1. Reclaim all waste 1,1,1-trichloroethane.
2. Remove 1,1,1-trichloroethane sludges from distillation unit.
3. Reclaim all waste trichloroethylene.
4. Remove trichloroethylene sludges from distillation unit.
5. Reclaim all waste tetrachloroethylene.
6. Remove tetrachloroethylene sludges from distillation unit.
7. Reclaim all waste methylene chloride.
8. Remove methylene chloride sludges from the distillation unit.
9. Reclaim all waste Freon solvents.
10. Remove Freon solvent sludges from the distillation unit.

All sludges from the distillation unit shall be placed in secure 55-gallon drum containers. The drums shall be placed on wooden pallets within the drum storage area to await off-site disposal at a licensed TSD facility. A maximum of 20 drums of sludge will be generated during the reclamation of the inventoried waste solvents.

Empty 55-gallon drum containers would be sold for reconditioning and resale by a drum reconditioner. Although Pride Solvents currently receives $5.00 per drum from drum reconditioners, for the purpose of this plan, the empty drums were assumed to have no resale value. All reclaimed solvents will be removed from the three distillate storage tanks and placed in 55-gallon drum containers for resale through Pride Solvents' distribution facility.

2.5 Reclamation System Decontamination

After reclaiming all inventoried waste solvents, the reclamation system will be decontaminated. It is assumed that all reclamation process equipment will contain residual amounts of waste solvent.

Process equipment requiring decontamination includes:

- settling tank;
- distillation unit;
- pumps and piping.

Decontamination of the process equipment during the planned closure will be performed by qualified Pride Solvents personnel. However, during the unplanned closure, the cost estimate for decontamination will be based upon the use of third party labor. Personnel will be equipped with solvent resistant coveralls, head protection, gloves, boots and face respirators.

The reclamation process equipment will be decontaminated as follows:

1. All screenings and residue from the settling tank will be removed and placed in a secure 55-gallon drum container.

2. Resins from the ion exchange drying column system will be removed and placed in secure 55-gallon drum containers.

3. All pumps, piping and valves will be disconnected and dismantled. Residues will be removed from the pumps, piping and valves by steam cleaning.

4. The settling tank, distillation unit will be decontaminated by steam cleaning. To assess whether the decontamination has been successful, a portable gas chromatograph and/or photoionization detector (PID) shall be used to measure solvent concentrations in the air inside each tank. The presence of more than 25 parts per million (ppm) of any solvent will result in rewashing the tank. If detectable quantities of VOCs are present after washing, final rinse water samples will be collected to be analyzed for TCLP volatile organic compounds.

5. Contaminated wash waters generated during the decontamination of the reclamation process equipment will be collected in secure 55 gallon drum containers. An estimated 8 drums of contaminated wash water will be generated. This estimate is based upon wash water requirements of approximately 10 percent of the tank volumes.

6. All 55-gallon drums containing sludges from the distillation unit, screenings and residue from the settling tank, resins from the contaminated wash water from process equipment decontamination shall be shipped off-site to a licensed TSD facility.

7. After removing all drummed materials from the drum storage area, the floors, berms and rampways which makeup the spill containment system in the drum storage and reclamation

areas shall be decontaminated by steam cleaning. All resulting wash waters will be collected in secure 55-gallon drum containers. An estimated 13 drums of contaminated wash water will be generated. This estimate is based upon a steam cleaner that operates for 4 hours and uses water at a rate of 3 gallons per minute. To assess whether the decontamination of the drum storage and reclamation areas is complete, samples of the final wash waters shall be collected and analyzed for VOCs via TCLP extraction. Decontamination by steam cleaning shall be repeated if the concentration of any individual contaminant (i.e., 1,1,1 trichloroethane, trichloroethylene, trichlorotrifluoroethane) exceeds its respective TCLP hazardous waste threshold concentration.

8. After all process equipment and containment systems have been decontaminated, 55-gallon drums containing contaminated wash waters will be shipped off-site for disposal at a licensed TSD facility.

9. Decontaminated process equipment shall be sold as scrap or as used equipment, depending upon its condition.

Due to the concrete secondary spill containment system within the buildings at Pride Solvents, soils beneath the facility are not expected to be contaminated by the waste storage and reclamation activities. Also an extensive soil and groundwater analysis program was conducted related to an UST removal program several years ago. The results of the program indicated that the soil and groundwater in the area of the facility are in compliance with NYSDEC requirements.

2.6 Partial Closure

Partial closure of Pride Solvents waste solvent storage and reclamation systems is a possibility as they may elect to operate the facility as a virgin solvents and chemical distribution center. If a partial closure of one or more of the reclamation system's process tanks, or other facility components/equipment becomes necessary, the required components/equipment would be decontaminated in accordance with the procedures set forth in Section 2.5 of this plan.

2.7 Certification of Closure

Upon completion of the facility closure, Pride Solvents and an independent registered Professional Engineer will submit to the NYSDEC certification documenting that the facility was closed in conformance with this Closure Plan.

3.0 CLOSURE COST ESTIMATE (Updated April 1999)

Two closure cost estimates have been prepared for Pride Solvents' waste storage and reclamation facility. The first cost estimate assumes that the maximum waste inventory would be reclaimed at the time of closure. The second cost estimate assumes that the reclamation process is inoperable and the maximum waste inventory must be disposed of off-site.

Each closure cost estimate has been divided into several categories dealing with waste inventory reclamation/disposal, equipment and containment system decontamination, waste disposal, sampling and analyses and closure certification. Both cost estimates include an administration cost of 15% and a contingency of 20%.

3.1 Planned Closure

Table 1, Closure Cost Estimate - Planned Closure, presents the itemized costs to perform the facility closure in accordance with the provisions of Sections 2.4 and 2.5 of this plan. It is assumed that the maximum waste inventory will be reclaimed by Pride Solvents at the time of closure. As shown in Table 1, Pride Solvents' labor and utility costs to reclaim the waste solvents is estimated at $10,000.

Costs to decontaminate the reclamation equipment and containment systems are estimated at $3,480 and $2,460 respectively. This includes plant personnel labor and supervision and rental costs for steam cleaning equipment.

Waste disposal costs include disposal of solvent sludges, wash waters, screenings, resins and residues. Waste solvent sludges would be disposed by DETREX, NJ at $100/drum and screenings and residues at $300 per drum.

An allowance of $950 was included to cover the cost of sampling and to collect and analyze wash water samples for contamination. Closure certification by a Professional Engineer was estimated at $3,400.

As indicated in Table 1, the total estimate closure cost, including administration and contingencies,$33,534. This cost would be more than offset by the income realized from the resale of the reclaimed waste solvent inventory. Income from this sale of reclaimed solvent is estimated between $70,000 and $80,000.

TABLE 1

CLOSURE COST ESTIMATE - PLANNED CLOSING
PRIDE SOLVENTS AND CHEMICAL CO. OF NY, INC.

ITEM	DESCRIPTION	COST
I	**Waste Inventory Reclamation**	
	1. Labor (280 mhrs @ $25)	$7,000
	2. Supervision (40 hrs @ $35)	1,400
	3. Utilities	1,600
	Subtotal	$10,000
II	**Equipment Decontamination**	
	1. Labor (72 mhrs @ $25)	$1,800
	2. Supervision (18 mhrs @ $35)	630
	3. Steam Cleaner Rental (3 days @ $350)	1,050
	Subtotal	$3,480
III	**Containment Decontamination**	
	1. Labor (48 mhrs @ $25)	$1,200
	2. Supervision (16 mhrs @ $35)	560
	3. Steam Cleaner Rental (2 days @ $350)	700
	Subtotal	$2,460
IV	**Waste Disposal**	
	1. Solvent sludges (20 drums @ $100)	$2,000
	2. Screenings, residues & resins (10 drums @$90)	900
	3. Wash water (21 drums @ $75)	1,575
	4. Labor (3 mhrs @ $25)	75
	Subtotal	$4,550
V	**Sampling and Analysis**	
	1. Soil and wash water sample collection	$450
	2. Air sampling (portable GC)	200
	3. Wash water analysis	300
	Subtotal	$950
VI	**Closure Certification**	
	1. Engineer (40 mhrs @ $85)	$3,400
	Subtotal	$3,400
VII	**Subtotal**	$24,840
	1. Administration (15%)	3,726
	2. Contingency (20%)	4,968
	Total Estimated Cost	$33,534

3.2 Unplanned Closure - Cost Estimate

Table 2, Closure Cost Estimate - Unplanned Closure, presents the itemized costs to perform an unplanned facility closure. The principal assumption for an unplanned closure is that the reclamation system would be inoperative or otherwise unable to reclaim the waste solvent. The waste inventory would, therefore, require disposal at an off-site TSDF.

Waste inventory disposal costs are estimated at $26,098. This includes a disposal cost of $104 per drum of still bottoms and $41.60 per drum of waste solvent by DETREX, NJ, including transportation. Disposal of bulk wastes from the process tanks is estimated at $90 per drum, including transportation.

Equipment and containment area decontamination costs are estimated at $3,525 and $3,160 respectively. Waste disposal costs for wastes generated during closure are slightly less than under a planned closure due to the absence of additional sludges generate during solvent reclamation. As shown in Table 2, waste disposal; costs were estimated at $3,281.

Costs for sampling and analyses and closure certification remain the same as under a planned closure. The total cost for an unplanned closure, including administration and contingencies, was estimated at $54,622.

TABLE 2

CLOSURE COST ESTIMATE - UNPLANNED CLOSURE
PRIDE SOLVENTS AND CHEMICAL CO. OF NY, INC.

ITEM	DESCRIPTION	COST
I	**Waste Inventory Reclamation**	
	1. Bottom solvent (70 drums @ $104/drum)	$7,280
	2. Waste solvent (410 drums @ $41.60/drum)	17,056
	2. Waste solvent (1,125 gals @ $1.30/gal)	1,462
	3. Labor (12 mhrs @ $25)	300
	Subtotal	$26,098
II	**Equipment Decontamination**	
	1. Labor (72 mhrs @ $25)	$1,800
	2. Supervision (18 mhrs @ $35)	630
	3. Stream Cleaner Rental (3 days @ $365)	1,095
	Subtotal	$3,525
III	**Containment Decontamination**	
	1. Labor (72 mhrs @ $25)	$1,800
	2. Supervision (18 mhrs @ $35)	630
	3. Steam Cleaner Rental (2 days @ $365)	730
	Subtotal	$3,160
IV	**Waste Disposal**	
	1. Screenings, residues & resins (5 drums @$312)	$1,568
	3. Wash water (21 drums @ $78)	1,638
	4. Labor (3 mhrs @ $25)	75
	Subtotal	$3,281
V	**Sampling and Analysis**	
	1. Soil and wash water sample collection	$472
	2. Air sampling (portable GC)	210
	3. Wash water analysis	315
	Subtotal	$997
VI	**Closure Certification**	
	1. Engineer (40 mhrs @ $85)	$3,400
	Subtotal	$3,400
VII	**Subtotal**	$40,461
	1. Administration (15%)	6,069
	2. Contingency (20%)	8,092
	Total Estimated Cost	$54,622

4.0 CLOSURE SCHEDULE

Two schedules for closing Pride Solvents' facility are presented in Tables 3 and 4, Closure Schedule - Planned and Unplanned Closures. The Planned Closure Schedule provides for notifying the generators and NYSDEC 180 days prior to closure. Both plans call for the completion of closure activities within 180 days of accepting the last shipment of spent solvents.

TABLE 3

CLOSURE SCHEDULE - PLANNED CLOSURE
PRIDE SOLVENTS & CHEMICAL CO., INC.

1.	Notify NYSDEC and Customers/Generators of pending facility closure	180 days prior to facility closure
2.	Submit Closure Plan to NYSDEC	180 days prior to facility closure
3.	Receive final volume of waste	180 days following notification
4.	Reclaim waste solvent inventory	Concurrent with Item 3
5.	Inspection/Certification	Upon completion of waste solvent inventory reclamation
6.	Decontaminate reclamation equipment	Upon completion of Item 5
7.	Inspection/Certification	Upon completion reclamation equipment decontamination
8.	Dispose of sludges, screenings, residues, resins, wash waters and empty drums	Upon completion of Item 7 and within 90 days of Item 3
9.	Decontaminate containment structures	Upon completion of Item 8
10.	Collect and analyze soil samples	Concurrent with Item 9
11.	Dispose of final wash wastes	Upon completion of Item 9
12.	Final Inspection/Certification	Upon completion of Items 10 and 11 and within 180 items of Item 3

TABLE 4

CLOSURE SCHEDULE - UNPLANNED CLOSURE
PRIDE SOLVENTS & CHEMICAL CO., INC.

1.	Receive final volume of waste solvents	
2.	Dispose of waste solvent inventory	Within 90 days of Item 1
3.	Inspection/Certification	Upon completion of waste inventory disposal
4.	Decontaminate reclamation equipment and containment structures	Upon completion of Item 3
5.	Inspection/Certification	Upon completion of decontamination work
6.	Dispose of sludges, screenings, resins, and wash waters	Upon completion of Item 5
7.	Collect and analyze soil samples	Concurrent with Item 6
8.	Final Inspection/Certification	Upon completion of Items 6 and 7 and within 180 days of Item 1